

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

VICKI STASI, SHANE WHITE, and
CRYSTAL GARCIA, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

INMEDIATA HEALTH GROUP
CORP.,

Defendants.

Case No. 21-cv-01419 (RAM)

**STIPULATED NOTICE OF
VOLUNTARY DISMISSAL**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiffs Vicki Stasi, Shane White, and Crystal Garcia and Defendant Inmediata Health Group Corp., by and through their undersigned counsel, hereby stipulate to the voluntary dismissal of this action without prejudice with each party bearing its own costs and fees.

WHEREFORE, it is respectfully requested that this Honorable Court issues Judgment without prejudice as requested herein.

IT IS HEREBY CERTIFIED that the foregoing motion was electronically filed with the Court using the CM/ECF system which will notify this filing by electronic means to all parties of record.

1 DATED: June 13, 2022

2
3 /s/ Benjamin F. Johns

4 Benjamin F. Johns, PA Bar No. 201373
5 Beena M. McDonald, PA Bar. No. 83315
6 CHIMICLES SCHWARTZ KRINER
7 & DONALDSON-SMITH LLP
8 One Haverford Centre
9 361 Lancaster Avenue
10 Haverford, Pennsylvania 19041
11 610.642.8500
12 *bffj@chimicles.com*
13 *bmm@chimicles.com*

14 Tina Wolfson
15 Theodore W. Maya
16 Bradley K. King
17 AHDOOT & WOLFSON, PC
18 2600 West Olive Avenue, Suite 500
19 Burbank, California 91505
20 Tel: 310.474.9111
21 Fax: 310.474.8585
22 *twolfson@ahdootwolfson.com*
23 *tmaya@ahdootwolfson.com*
24 *bking@ahdootwolfson.com*

25 Cornelius P. Dukelow
26 Oklahoma Bar No. 19086
27 ABINGTON COLE + ELLERY
28 320 South Boston Avenue
Suite 1130
Tulsa, Oklahoma 74103
918.588.3400 (*telephone & facsimile*)
cdukelow@abingtonlaw.com

*Counsel to Plaintiffs and
the Proposed Classes*

/s/ Raul S. Mariani Franco

Raul S. Mariani Franco
Mariani-Franco Law, PSC
USDC-PR NO. 210309
P.O. Box 9022864
San Juan, PR 00902-2864
Tel: 787.620-0038
Fax: 787.620.0039
marianifrancolaw@gmail.com

*Local Counsel for Defendant
Inmediata Health Group Corp.*

Jon P. Kardassakis
LEWIS BRISBOIS BISGAARD
& SMITH LLP
633 West 5th Street, Suite 4000
Los Angeles, CA 90071
213.680.5040
Jon.kardassakis@lewisbrisbois.com

*Attorney for Defendant Inmediata
Health Group Corp.*
